## **Comments regarding RM-10786**

From Michael Helm WC5Z

I am opposed to this petition.

The No-Code International group was started with the objective of eliminating Morse code testing worldwide. Among their arguments, they have called Morse code testing requirements "onerous". This cannot be the case in fact, because the existence of hundreds of thousands of licensed amateurs who have taken Morse code exams to obtain their licenses proves that Morse code testing is not in fact "onerous".

Morse code has had a long and fine tradition in the hobby of amateur radio and is one of the elements that helped build a common fraternity because it represents a common skill among amateur radio operators that requires a commitment of at least some minimal amount of time and practice to acquire. Morse code provides a common and simple method of minimalist communication. It is the method of communications most often used in weak signal experimentation and in low powered home engineered and built equipment. It has tremendous appeal to a large segment within the hobby.

Morse code does not interest everyone, nor should it, but it is a traditional element of the hobby of amateur radio. The level of fraternalism and common bond among members of the amateur radio community has already been seriously hurt by the no-code Tech license and has further been hurt by the more recent changes where the Morse code exam speeds were dropped to 5 wpm for the remaining license classes. Complete elimination of Morse code exams will further widen that dichotomy.

In the interest of compromise to satisfy both sides of this debate, please keep a Morse code exam in place for the Extra class license and retain CW sub-bands in the HF spectrum and VHF spectrum for those who want to use this mode. There are still many Morse code enthusiasts in the hobby and we should protect this legacy by maintaining spectrum space for CW and retaining a Morse code exam requirement for the Extra class license. Due to the amount of "mode creep" I have observed in recent years, I would even suggest making the lower end of the HF bands exclusive for Morse code and to keep other digital based modes a bit higher in the band. Anyone who is seriously interested in operating using Morse code will have no problem with taking a Morse code exam to gain access to a CW only sub-band segment.